

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

IN RE:

SPIG INDUSTRY, LLC

15-70310

MOTION TO REOPEN CASE, GRANT DISCHARGE AND SHORTEN TIME

Now comes the Reorganized right so file Debtor, by counsel, and moves the Court for entry of an order reopening the case and granting it a discharge and as grounds therefor states as follows:

1. Debtor filed a petition seeking relief under Chapter 11 of the United States Bankruptcy Code on March 16, 2015 and continued in Chapter 11 until its plan was confirmed on March 10, 2015. Thereafter its case was closed pursuant to an order of this court dated May 16, 2017 [Docket Entry 145], subject to being reopened.

2. Jurisdiction arises in this Court pursuant to 28 U.S.C. §157. This is a core proceeding.

3. The Reorganized Debtor has substantially consummated and completed its Chapter 11 plan, save and except some future distributions that are required to be made under the confirmed plan to its remaining unsecured creditors.

4. Under the confirmed plan, the Creditors Committee remained active and the Reorganized Debtor and the Creditors Committee have negotiated a repayment plan for the rest and remainder of the unsecured debt.

5. Following confirmation, the Reorganized Debtor successfully had its products approved by the Federal Highway Commission so that they can be sold and used across the entire United States. As a result of this approval, the Reorganized Debtor's orders for its

products have dramatically increased requiring a need for additional capital to pay for inventory, machinery and additional employees. Lenders are available to provide this capital, but they have requested and required that the Reorganized Debtor receive a discharge from its prior case before any additional extensions of credit can be made. The Reorganized Debtor therefore seeks an order reopening its case for the purpose of receiving a discharge, so it can continue its future business operations.

MOTION TO SHORTEN TIME

11. The Reorganized Debtor moves the court to shorten the noticing requirement for hearing on the foregoing motion.

WHEREFORE, your Reorganized Debtor prays that the Court enter an order reopening the case and granting the Reorganized Debtor its discharge.

NOTICE OF HEARING

PLEASE TAKE NOTICE that on the **20th day of January, 2021@1:00 PM**, the undersigned will move the United States Bankruptcy Court, 180 West Main Street, Abingdon, Virginia, for entry of an Order, shortening time and granting its motion. This hearing will be conducted via a Zoom video conferencing system. If any party wishes to participate they should contact Sabrina Lee, Courtroom Deputy at the Bankruptcy Court in Roanoke.

**SPIG INDUSTRY, LLC
By Counsel**

/s/Robert T. Copeland
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Counsel for Reorganized Debtor

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed on this date with the United States Bankruptcy Court via the ECF system, and that true copies of the same were mailed via first class mail, postage prepaid, to all creditors and other parties in interest as shown on the mailing matrix in this case.

Dated: January 4, 2021

/s/ Robert T. Copeland